



agreement was to knowingly make false statements and representations with respect to the information required to be kept in the records of a licensed dealer under Chapter 44 of Title 18, United States Code.

#### **MANNER AND MEANS OF THE CONSPIRACY**

1. It was part of the conspiracy that, the defendant, [REDACTED] enlisted, directed, and recruited individuals which included, the defendants [REDACTED], MIGUEL ANGEL LUITON, [REDACTED], ANTONIO RAFAEL RUVALCABA, IKE SAMUEL JR., JOSE DOSAL, and ESTER CARDENAS to purchase firearms for and or to recruit others to purchase firearms for the, defendant, [REDACTED]

2. As part of the conspiracy, [REDACTED] along with Norma Delgado, a previously indicted conspirator, at the behest of [REDACTED] recruited the defendants, IKE SAMUEL JR., JOSE DOSAL, ESTER CARDENAS and previously indicted conspirators Luis Joaquin Cantalapiedra and Carmelita Ramos Jones, to purchase firearms.

3. As part of the conspiracy, Carlos Alberto Torres, a previously indicted conspirator, at the behest of [REDACTED] recruited the defendants, MIGUEL ANGEL LUITON, [REDACTED], and ANTONIO RAFAEL RUVALCABA to purchase firearms.

4. It was further part of the conspiracy that, the defendant, [REDACTED], would provide the money for the purchase of the firearms and instruct the co-conspirators as to which firearms to buy. The co-conspirators would be paid a fee for each firearm they purchased.

5. Finally, it was also part of the conspiracy that the purchasers of the firearms, which included the defendants, MIGUEL ANGEL LUITON, [REDACTED], ANTONIO RAFAEL RUVALCABA, IKE SAMUEL JR., JOSE DOSAL, ESTER CARDENAS, Luis Joaquin Cantalapiedra and Carmelita Ramos Jones would acquire and attempt to acquire firearms from licensed dealers by knowingly making false and fictitious statements and representations with respect to the information required to be kept in the records of a licensed dealer under Chapter 44 of Title 18, United States Code.

**OVERT ACTS:**

1. On or about May, 2010, [REDACTED] recruited Norma Delgado, Carlos Alberto Torres and [REDACTED] to find people to buy firearms for [REDACTED].
2. On or about June, 2010, Norma Delgado and [REDACTED] recruited Carmelita Ramos Jones, Luis Joaquin Cantalapiedra, JOSE DOSAL, ESTER CARDENAS, and IKE SAMUEL JR., to purchase firearms for [REDACTED].
3. On or about June, 2010, Carlos Alberto Torres recruited [REDACTED], MIGUEL ANGEL LUITON, and ANTONIO RAFAEL RUVALCABA to purchase firearms for [REDACTED].
4. On or about June 8, 2010, the defendant, [REDACTED] provided money to Carlos Alberto Torres, for the purchase of a firearm. Carlos Alberto Torres in turn provided the money to [REDACTED] for the purchase of a firearm.
5. On or about June 8, 2010, the defendant, [REDACTED], purchased one Bushmaster, .223 caliber semi-automatic rifle, serial number L530017,

from Lone Star Guns, by knowingly making a false statement and representation.

6. On or about June 9, 2010, [REDACTED] was paid a fee of two hundred dollars by [REDACTED] for the purchase of the Bushmaster rifle.

7. On or about June 11, 2010, the defendant, [REDACTED], provided money to Carlos Alberto Torres, for the purchase of a firearm. Carlos Alberto Torres in turn provided the money to MIGUEL ANGEL LUITON for the purchase of a firearm.

8. On or about June 11, 2010, the defendant, MIGUEL ANGEL LUITON, purchased one Zastave Kragusevac, 7.62 x 39 caliber semi-automatic rifle, serial number AB2T-N103210, from Danny's Pawn & Sporting Goods, by knowingly making a false statement and representation.

9. On or about June 11, 2010, MIGUEL ANGEL LUITON was paid a fee of two hundred dollars for the purchase of the Zastave Kragusevac rifle.

10. On or about June 15, 2010, the defendant, [REDACTED], provided money to Carlos Alberto Torres, for the purchase of firearms. Carlos Alberto Torres in turn provided the money to [REDACTED] MIGUEL ANGEL LUITON, and ANTONIO RAFAEL RUVALCABA for the purchase of firearms.

11. On or about June 15, 2010, the defendant, [REDACTED], purchased one Stag Arms, .223 caliber semi-automatic rifle, serial number 124497, from Danny's Pawn & Sporting Goods, by knowingly making a false statement and representation.

12. On or about June 15, 2010, the defendant, MIGUEL ANGEL LUITON, purchased one Bushmaster, .223 caliber semi-automatic rifle, serial number L526639, from Lone Star Guns, by knowingly making a false statement and representation.

13. On or about June 15, 2010, the defendant, ANTONIO RAFAEL RUVALCABA, purchased one Armalite, .223 caliber semi-automatic rifle, serial number US351321, from Danny's Pawn & Sporting Goods, by knowingly making a false statement and representation.

14. On or about June 15, 2010, [REDACTED], MIGUEL ANGEL LUITON, and ANTONIO RAFAEL RUVALCABA were each paid a fee of two hundred dollars each for the firearm each purchased.

15. On or about June 22, 2010, the defendant, [REDACTED] provided money to Norma Delgado, for the purchase of a firearm. Norma Delgado and [REDACTED] in turn provided the money to Luis Joaquin Cantalapiedra for the purchase of a firearm.

16. On or about June 22, 2010, Norma Delgado and [REDACTED] drove Luis Joaquin Cantalapiedra to Johnny's True Value Hardware for the purpose of purchasing a firearm for [REDACTED].

17. On or about June 22, 2010, Luis Joaquin Cantalapiedra purchased one Bushmaster, .223 caliber semi-automatic rifle, serial number L534132, from Johnny's True Value Hardware, by knowingly making a false statement and representation.

18. On or about June 22, 2010, Luis Joaquin Cantalapiedra was paid a fee by [REDACTED] for the firearm he purchased.

19. On or about June 29, 2010, the defendant, [REDACTED] provided money to Norma Delgado, for the purchase of a firearm. Norma Delgado and [REDACTED] in turn provided the money to IKE SAMUEL JR., JOSE DOSAL, and

ESTER CARDENAS for the purchase of firearms.

20. On or about June 29, 2010, Norma Delgado and [REDACTED] drove IKE SAMUEL JR., to Johnny's True Value Hardware for the purpose of purchasing a firearm for [REDACTED].

21. On or about June 29, 2010, Norma Delgado and [REDACTED] met JOSE DOSAL and ESTER CARDENAS at Johnny's True Value Hardware for the purpose of instructing them on the purchase of firearms for [REDACTED].

22. On or about June 29, 2010, IKE SAMUEL JR., purchased one Bushmaster, .223 caliber semi-automatic rifle, serial number BFI641108, from Johnny's True Value Hardware, by knowingly making a false statement and representation.

23. On or about June 29, 2010, JOSE DOSAL purchased one DPMS, .223 caliber semi-automatic rifle, serial number FH79051, from Johnny's True Value Hardware, by knowingly making a false statement and representation.

24. On or about June 29, 2010, ESTER CARDENAS purchased one CIA, 7.62 x 39 caliber semi-automatic rifle, serial number ABT2-N101666, from Johnny's True Value Hardware, by knowingly making a false statement and representation.

25. On or about June 29, 2010, IKE SAMUEL JR., JOSE DOSAL, and ESTER CARDENAS were each paid a fee for the firearm each purchased.

26. On or about July 8, 2010, the defendant, [REDACTED], provided money to Norma Delgado, for the purchase of a firearm. Norma Delgado and [REDACTED] in turn provided the money to Carmelita Ramos Jones for the



purchase of a firearm.

27. On or about July 8, 2010, Carmelita Ramos Jones, at the behest of Norma Delgado and [REDACTED] purchased one Century Arms, 7.62 X 39 caliber semi-automatic rifle, serial number 1985PO6611, from Johnny's True Value Hardware by knowingly making a false statement and representation.

28. On or about July, 8, 2010, Carmelita Ramos Jones was told by [REDACTED] to return the firearm because she had purchased the wrong firearm.

29. On or about July 9, 2010, the defendant, [REDACTED] provided money to Norma Delgado, for the purchase of a firearm. Norma Delgado and [REDACTED] in turn provided the money to JOSE DOSAL , and Carmelita Ramos Jones for the purchase of a firearm.

30. On or about July 9, 2010, Norma Delgado and [REDACTED], drove JOSE DOSAL, ESTER CARDENAS, and Carmelita Ramos Jones to Danny's Pawn & Sporting Goods and to The Armory for the purpose of purchasing firearms for [REDACTED]

31. On or about July 9, 2010, Carmelita Ramos Jones, at the behest of Norma Delgado and [REDACTED] purchased one Century Arms, 7.62 X 39 caliber semi-automatic rifle, serial number DC175010, from Danny's Pawn & Sporting Goods by knowingly making a false statement and representation.

32. On or about July 9, 2010, JOSE DOSAL, at the behest of Norma Delgado and [REDACTED] purchased one Century Arms, 7.62 X 39 caliber semi-automatic rifle, serial number DC258Z10, from Danny's Pawn & Sporting Goods by knowingly making a false statement and representation.

33. On or about July 9, 2010, JOSE DOSAL, at the behest of Norma Delgado and [REDACTED], purchased one Century Arms, 7.62 X 39 caliber semi-automatic rifle, serial number DR309509, from The Armory by knowingly making a false statement and representation.

34. On or about July 9, 2010, JOSE DOSAL and Carmelita Ramos Jones were each paid a fee for the firearm each purchased.

35. On or about July 15, 2010, the defendant, [REDACTED], provided money to Norma Delgado, for the purchase of a firearm. Norma Delgado and [REDACTED] in turn provided the money to Carmelita Ramos Jones for the purchase of a firearm.

36. On or about July 15, 2010, Norma Delgado and [REDACTED], drove Carmelita Ramos Jones to Lone Star Guns for the purpose of purchasing a firearm for [REDACTED].

37. On or about July 15, 2010, Carmelita Ramos Jones, at the behest of Norma Delgado and [REDACTED], purchased one Bushmaster, .223 caliber semi-automatic rifle, serial number L529172, from Lone Star Guns by knowingly making a false statement and representation.

In violation of Title 18, United States Code, Sections 371, 924(a)(1)(A) and Title 18, United States Code, Section 2.

#### COUNT TWO

On or about June 8, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,



[REDACTED]  
**and**  
[REDACTED]

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Lone Star Guns, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, [REDACTED], did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of one Bushmaster, .223 caliber semi-automatic rifle, serial number L530017, whereas in truth and in fact, she was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

**COUNT THREE**

On or about June 11, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

[REDACTED]  
**and**  
**MIGUEL ANGEL LUITON,**

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Danny's Pawn & Sporting Goods, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, MIGUEL ANGEL LUITON, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and

Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one 7.62x39 caliber semi-automatic rifle, serial number AB2T-N103210, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT FOUR

On or about June 15, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

[REDACTED]

and

[REDACTED]

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Danny's Pawn & Sporting Goods, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, [REDACTED], did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of one .223 caliber semiautomatic rifle, serial number, 124497, whereas in truth and in fact, she was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT FIVE

On or about June 15, 2010, in the Southern District of Texas, and within the

jurisdiction of the court, the defendants,

  
and  
**MIGUEL ANGEL LUITON,**

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Lone Star Guns, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, MIGUEL ANGEL LUITON, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one .223 caliber semiautomatic rifle, serial number, L526639, whereas in truth and in fact, he was acquiring the firearms on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT SIX

On or about June 15, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

  
and  
**ANTONIO RAFAEL RUVALCABA,**

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Danny's Pawn & Sporting Goods, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, ANTONIO RAFAEL RUVALCABA,

did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one .223 caliber semiautomatic rifle, serial number, US351321, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about June 22, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,



knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendants caused, Luis Joaquin Cantalapiedra, to execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one .223 caliber semiautomatic rifle, serial number, L534132, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT EIGHT

On or about June 29, 2010, in the Southern District of Texas, and within the

jurisdiction of the court, the defendants,

[REDACTED]

and  
**IKE SAMUEL JR.,**

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, IKE SAMUEL JR., did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one .223 caliber semiautomatic rifle, serial number, BFI641108, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

**COUNT NINE**

On or about June 29, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

[REDACTED]

and  
**JOSE DOSAL,**

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, JOSE DOSAL, did execute a U.S.

Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one .223 caliber semiautomatic rifle, serial number, FH79051, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT TEN

On or about June 29, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,



**and  
ESTER CARDENAS,**

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, ESTER CARDENAS, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of one 7.62 x 39 caliber semiautomatic rifle, serial number, ABT2-N101666, whereas in truth and in fact, she was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT ELEVEN

On or about July 8, 2010, in the Southern District of Texas, and within the

jurisdiction of the court, the defendants,



knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendants caused, Carmelita Ramos Jones, to execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of one 7.62 x 39 caliber semiautomatic rifle, serial number, 1985PO6611, whereas in truth and in fact, she was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT TWELVE

On or about July 9, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,



knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Danny's Pawn & Sporting Goods, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendants caused, Carmelita Ramos Jones, to execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and



Explosives Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of one 7.62 x 39 caliber semiautomatic rifle, serial number, DC175010, whereas in truth and in fact, she was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT THIRTEEN

On or about July 9, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

[REDACTED]

and  
**JOSE DOSAL,**

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Danny's Pawn & Sporting Goods, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, JOSE DOSAL, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one 7.62 x 39 caliber semiautomatic rifle, serial number, DC-258Z-10, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT FOURTEEN

On or about July 15, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,




knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Lone Star Guns, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendants caused, Carmelita Ramos Jones, to execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of one .223 caliber semiautomatic rifle, serial number, L529172, whereas in truth and in fact, she was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
ANGEL CASTRO  
Assistant United States Attorney